

54.313(a)(5) Satisfactions of Consumer Protection and Service Quality Standards

Consumer Protection - Voice and Broadband

Dubois Telephone Exchange, Inc. complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employee handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

Service Quality Standards

Voice

Dubois Telephone Exchange, Inc. complies with the service quality standard rules of the Federal Communications Commission and with the State of Wyoming as promulgated in the Wyoming Public Service Commission Rules 501 and 503 and with the State of Colorado per 723-2-2187 (f)(II)(D). Dubois Telephone Exchange, Inc. is committed to providing the highest quality service to its subscribers.

Broadband

Dubois Telephone Exchange, Inc. complies with the service standards noted in NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

Service Quality Standards and Consumer Protection Rules Annual Certification

Michael J. Kenney
Printed Name of Officer

Vice Pres/General Manager
Title of Officer

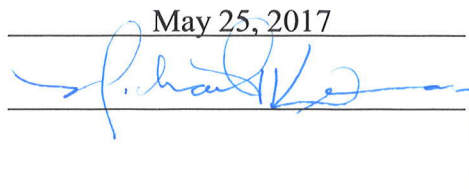
Dubois Telephone Exchange, Inc.
Company Name

I am authorized to provide this certification on behalf of the Company. I hereby certify that the Company is in compliance with applicable service quality standards and consumer protection rules.

Executed On

May 25, 2017

Signature



Summary Back-up Power by Wire Center										
DUBSWY	updated 06/05/2017									
Type	Location	Generator	Size	Fuel	Capacity	Run Time (hr)	Battery Type	Dual/Single	Qty	Run Time
BLC Cabinet	Bitterroot	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Brooks Lake	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Buffalo Buttes	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Burris	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC Cabinet	Burris Lenore	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	CM Ranch	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	Dinwoody	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC Cabinet	Dinwoody East	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	East Crowheart	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	East Fork	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC cabinet	Jakey's Fork	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC Cabinet	Lower Dunoir	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Pinnacles Summer	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	Porcupine	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	River Park	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC Cabinet	Rivers Edge	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Stoney Point	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	Thunderhead	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	Torrey	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	TVRC	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Upper Dunoir	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Cabinet	Utzinger	Portable					sealed lead acid	SINGLE	4	8 HOURS
BLC Cabinet	Wilderness	Portable					sealed lead acid	TRIPLE	12	8 HOURS
BLC Hut	Dunoir	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Little Warm	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Pinnacles	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Rice	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Taylor Creek	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Timberline	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Union Pass	Portable					sealed lead acid	DUAL	8	8 HOURS
BLC Hut	WILDERNESS	Portable					Sealed lead acid	DUAL	8	8 HOURS
BLC Hut	Windy	Generac	150KW	Diesel	400	25	sealed lead acid	DUAL	8	20 HOURS
CO Switch	Dubois CO	Generac	150KW	Diesel	369	31	Flooded Cells	DUAL	48	8 HOURS
Inside Cust bld	Assisted Living	Portable					sealed lead acid	SINGLE	4	8 HOURS
Inside Cust bld	Dubois Town Hall	Portable					sealed lead acid	SINGLE	1	8 HOURS
Inside Cust bld	HeadWaters	Portable					sealed lead acid	SINGLE	1	8 HOURS
Inside Cust bld	Wells Fargo	Portable					sealed lead acid	SINGLE	1	8 HOURS
ReGen Hut	Crowheart	Onan	12.5KW	Propane	300	114	sealed lead acid	DUAL	8	8 HOURS
ReGen Hut	Ethete	Generac	15KW	LPG	250	91	sealed lead acid	DUAL	8	8 HOURS
ReGen Hut	Pilot Butte	Generac	40KW	LPG	250	43	sealed lead acid	DUAL	8	8 HOURS
ReGen Hut	Togwotee	Generac	35KW	LPG	400	213	sealed lead acid	DUAL	8	8 HOURS
Portable Generators										
Location	Manufacturer		Size	Fuel						
Dubois	Homelite		4.4KW	gas						
Dubois	Homelite		4.4KW	gas						
Dubois	Honda		2KW	gas						
Dubois	Onan		6KW	gas						
Dubois	Onan		6KW	gas						

BGGSWY updated 06/05/2017

Portable Generators

Network Interface Devices (Total Company)

- ### Ability to reroute traffic in an Emergency Situation

Capability to manage traffic in an Emergency Situation

DTE serves 1949 customers (Dubois and Baggs), with a Metaswitch soft switch and a Next Gen Broadband Loop Carrier (BLC) platform. Switches and BLCs are adequately configured to ensure carrier class equipment fault/failure tolerance. Transport capacity to the outside world is fiber optic. Numerous carriers have trunks/bandwidth capacity to Dubois and Baggs adequate to handle their traffic projections. However, DTE cannot take responsibility for the capabilities of those interconnected carriers to manage their traffic during an emergency situation.

PURPOSE

The primary purpose of the Dubois Telephone (DTE) Business Continuity and Disaster Preparedness Plan is to protect DTE and its employees from serious injury, property loss, or loss of life in the event of a major disaster. The secondary purpose of the DTE Business Continuity and Disaster Preparedness Plan is to assure the continuation of communications service to DTE customers in the event of a Disaster or emergency. A Disaster or emergency constitutes any one of the following: fire, severe weather such as tornado, flood, earthquake, blizzard conditions as set forth by community leader, bomb threat, pandemic or hazardous chemical spill.

In the event of any Disaster or emergency listed, this plan describes the responsibilities and actions to be taken to protect all employees and property.

I. GENERAL PROCEDURES

A Disaster or emergency warning may come from any one of the following sources: commercial radio or television, civil defense radio, office alarm system, messenger, General Manager or police.

A. Notification of Emergency Warning

A person receiving notification of a possible Disaster or emergency should immediately notify their immediate supervisor. The type of Disaster or emergency situation should then be conveyed to all employees with the use of the office emergency alarm and/or paging system.

B. Emergency Control Committee (ECC)

The following personnel will constitute the Emergency Control Committee (ECC). In the event of a Disaster or emergency, they are to report to a designated Emergency Control Center unless the prevailing situation dictates otherwise.

GENERAL MANAGER

Phone: 307-455-2341

Mobile: 307-851-1777

OPERATIONS MANAGER

Phone: 307-455-2341

Mobile: 307-851-2401

ENGINEERING MANAGER

Phone: 307-455-2341

Direct: 307-450-8029

C. Safety Supervisor

The **OPERATIONS Manager** has been designated as the Safety Supervisor and serves as the coordinator for all safety and safety training issues.

D. Emergency Control Committee (ECC) Responsibilities

Following is a list of responsibilities assigned to the Emergency Control Committee (ECC):

1. Assess the nature and extent of all emergencies
2. Assume control of all emergency actions.
 - a. Notify and coordinate with Emergency Response, Public Safety Answering (PSAP), Civilian Emergency Response Team (CERT)-County Notification
 - b. Wyoming PSC if necessary 307-777-5722
 - c. Colorado PUC if necessary 303-894-2000
3. Communicate emergency to employees
4. Assign tasks to personnel to carry out specific actions
5. Order evacuation if deemed necessary
 - a. Account for all employees
6. Take any other action necessary to protect life
7. Annually review this plan and revise as necessary
8. Plan training exercises to test the evacuation plan
9. Instruct personnel of their duties under this plan

In any Disaster or emergency situation, the ranking member of the Emergency Control Committee (ECC) present shall have final authority to coordinate procedures, and amend, modify or supersede any provisions of this plan in order to ensure employee safety.

E. Emergency Control Center

Emergency actions should be coordinated at the Emergency Control Center, which will be designated as the General Manager's office at 12 South 1st Street, Dubois, WY.

F. First Aid Services

Any member of the Emergency Control Committee (ECC) will administer first aid as needed. He/She will be available to administer first aid in the office, or in the event of a complete evacuation, at a safe assembly area outside the office. In addition, several other DTE employees have also successfully completed Basic First Aid and CPR training, and may be called upon by a member of the Emergency Control Committee if the situation warrants. – Notify EMS immediately if First Aid or CPR warranted.

G. Utility Controls

The Emergency Control Committee (ECC) members will notify Gas and/or Electric Utility to have the power and/or gas shut off.

H. News Information

Information to any source of the news media will only be released at the discretion of the General Manager or Chief Executive Officer, Chief Financial Officer, Chief Technical Officer or Director of Marketing.

II. EMERGENCY ALARMS

A. Fire Alarm System

In the event of a fire, the alarm system will be activated. In addition, a member of the Emergency Control Committee (ECC) will make an announcement over the paging system stating an emergency exists. Upon hearing the alarm or announcement, employees should, immediately proceed to the designated evacuation site located at the Warehouse Building next to the premises. A roll call using the Fire/Evacuation Plans and Current Employee Roster will be called to ensure employees are safe. In addition, all visitors in the building must be accounted for.

B. Action

When the alarm is activated or an announcement is made, at least one (1) member of the Emergency Control Committee (ECC) shall report to the designated evacuation site outside the office complex. That Committee member should ensure that outside employees do not re-enter the building. The remaining members of the Emergency Control Committee (ECC) other members should take any necessary actions to ensure safety of the employees and visitors and notify proper agencies for needed services.

C. Office-Wide Evacuation Alarm

With the exception of a fire alarm, employees should not evacuate the building unless authorized by the Emergency Control Committee (ECC). The signal alarm for an office wide evacuation will be a continuous alarm and/or an announcement by a member of the Emergency Control Committee (ECC) over the paging system stating an evacuation is ordered.

D. Segmented Area Evacuation

The signal/alarm for a segmented area evacuation will also be a continuous alarm and/or an announcement over the paging system by a member of the Emergency Control Committee (ECC), stating a segmented evacuation is ordered. A member of the Emergency Control Committee (ECC) will have the authority to activate this alarm and give appropriate instructions to employees to ensure safety. It is the responsibility of this person to alert all employees as to what type of emergency is occurring and the location of the emergency. Once at the assembly site, an employee roll call will be conducted and reported to an Emergency Control Committee (ECC) member. In addition, all visitors in the building must be accounted for.

E. Phone Listings

Listings of all emergency telephone numbers are located at the receptionist desk and in the offices of all Emergency Control Committee (ECC) members.

If the emergency occurs during other than normal working hours, the General Manager or Operations Manager will notify the other emergency control team with an announcement of where the control committee will meet. If the business office has not been affected then the conference rooms at the business office, if the office building has been affected then meet at the Warehouse Building location.

III. EVACUATION SITES

A map of all evacuation sites will be displayed in the **conference room** and throughout the departments. Each map will show the route and exit to take depending on where employees are located in the office. It will be the responsibility of the Safety Supervisor to inform employees of these evacuation routes.

IV. EMERGENCY SHUTDOWN PROCEDURE FOR DISASTERS

An emergency shutdown will only be ordered from the highest-ranking member of the Emergency Control Committee. No employee should risk any type of injury to accomplish this task. However, if time permits, the following duties should be performed:

1. All aisles and exit ways should be free of obstructions.
2. The Operations Manager should call Utility to shut off gas lines and the electrical supply. In the event that the Safety Supervisor is unavailable, a member of the Emergency Control Committee (ECC) shall take such action.
3. In the event of a disaster or emergency, the following procedures should be put in effect by the Safety Supervisor or other members of the **Emergency Control Committee (ECC)**:

V.1 TORNADO

1. Listen for the latest advisories on the radio.
2. Utilize exterior cameras for outside observation.
3. If necessary, initiate applicable emergency shutdown procedure.
4. Make an announcement over the paging system stating "A tornado emergency exits — please proceed to the basement."
5. Move personnel into the designated tornado safe assembly area within the building – in the basement by the caged area behind the break room. - Once all are assembled, a roll call will be taken.
6. Account for all visitors.
7. After the tornado passes, restore calm and check for injuries.

V.2 SEVERE WEATHER/BLIZZARD

1. Listen; or watch for weather advisories on the radio, television or Internet.
2. Depending on weather severity, e.g., (Mayor shuts down the town for safety reasons etc.), the General Manager will make the determination on whether to initiate emergency office closure.
 - a. Management staff and key office personnel may be required to work remotely (telecommute) if they are equipped to do so. Key employees are defined as those in management and customer contact individuals such as Customer Service Specialists and Operations Technicians including IT. The phones will need to be routed to reach key employees by landline or cell phone.
 - b. For service outages, network personnel will respond when city officials or the Emergency Control committee has deemed it safe to do so.
3. Managers will notify their staff immediately of office closure once the decisions have been made. Each manager should have a copy of all contact names and numbers along with the employee roster.
4. In the event of Department of Transportation (DOT) road closures where the office remains open, staff that are unable to make it to the office will be required to take vacation. In the event that employees do not have accrued vacation they will go negative on the books and future accrual will be used to back fill unavailable vacation balance.

V.3 EARTHQUAKE

An earthquake will usually occur without warning. Due to the suddenness, all personnel should:

1. Drop to the ground
2. Take Cover
3. Hold On Until the shaking stops
4. Additional information
 - a. If there isn't a table or desk near you, drop to the ground in an inside corner of the building and cover your head and neck with your hands and arms. Do not try to run to another room just to get under a table.
 - b. Studies of injuries and deaths caused by earthquakes in the U.S. over the last several decades indicate you are much more likely to be injured by falling or flying objects (TVs, lamps, glass, bookcases, etc.) than to die in a collapsed building. "Drop, Cover, and Hold On" offers the best overall level of protection in most situations.
 - c. **DO NOT ATTEMPT TO EXIT THE BUILDING - NO ONE SHOULD GO OUTSIDE THE BUILDING.**
5. After an earthquake has stopped, the following procedure should be initiated:
 - a. All employees should help restore calm to fellow employees.

- b. Emergency Control Committee (ECC) members should check for injuries and provide first aid as needed.
- c. Evacuate the building immediately following the earthquake. Damage to the structure may have resulted. Proceed to the designated assembly area.
- d. The Safety Supervisor should check for fires and shut off all gas, electricity, and water at main controls.
- e. The building should be inspected by a member of the Emergency Control Committee for damage.
- f. The Emergency Control Committee should then notify proper utility companies or other services as needed.

V.4 FIRE/BOMB THREAT

In the event of a fire, appropriate actions as defined under Section III. A-C. "Office-Wide Evacuation Alarms" shall be taken.

V.5 PANDEMIC

A pandemic is an epidemic disease that spreads to other communities usually beyond national borders. In the event of a pandemic such as Bird Flu or H1N1 the following procedure should be initiated.

- 1. Listen, or watch for advisories on the radio, television or Internet of an upcoming Pandemic.
- 2. Once identified the General Manager and/or Control Committee will initiate office closure procedures.
- 3. The following key employees will have and maintain internet access and phone service so they can telecommute if necessary.
 - a. General Manager
 - b. Operations Manager
 - c. Finance & Administration Manager
 - d. Controller
 - e. IT Supervisor
 - f. Engineering Manager
 - g. Plant Manager
 - h. Central Office Manager
 - i. Customer Service Specialists
 - j. Network Technicians
- 4. In case of pandemic, all calls will be dispatched to the Operations Manager for call out to the technicians.
- 5. If quarantine goes into effect, technicians will not go beyond the demarcation point at any residence or business.
- 6. Technicians will wear masks to cover their nose and mouth and can walk away from any trouble where they may be exposed to the virus.
- 7. Employees who are sick with the virus or other ailment must report their illness to their department head immediately and take leave.
- 8. Once the pandemic is lessened or the quarantine is removed, all employees will be notified to report back to the office.

V. HOUSEKEEPING

Good housekeeping will be the responsibility of all DTE employees and includes the following:

- A. Waste materials are to be discarded in their proper places.
- B. All aisles and exits will be kept clear.
- C. All areas to fire extinguishers will be kept clear for access.
- D. All employees will be instructed and receive an electronic copy on the "DTE Communications Business Continuity and Disaster Preparedness Plan."
- E. Emergency telephone numbers will be posted at the front desk and in the lower level break room.
- F. The Safety Supervisor will be responsible for instructing employees on how to handle, store, and maintain hazardous materials properly.

VI. CYBER SECURITY

Ongoing Development of the corporate Cyber Security Policy and Procedure following the Communications Security Reliability and Interoperability (CSRIC) and National Institute of Standards and Technology (NIST) framework.

SECTION 1 EMERGENCY RESPONSE

I. PURPOSE

This Section 1 provides an Emergency Response Plan for restoring communications services following an outage resulting from a disaster or emergency. It also identifies critical communications services requiring immediate restoration to support disaster recovery efforts.

II. DEFINITIONS

In the event of a Disaster or emergency, the warning may come from any one of the following sources: commercial radio or television, civil defense radio, office alarm system, messenger, or police.

A. Disaster or Emergency – A significant event resulting in the partial or entire loss of communications capability within an exchange serving area. A significant event can include any major natural occurrence such as a flood, earthquake, fire, tornado or other severe weather, or an unnatural occurrence such as a bombing, arson, or other terrorist related threat. Other events can include, but not be limited to, an intentional or unintentional fiber or copper cable cut.

B. Emergency Control Committee (ECC) – The DTE Emergency Response Team is a group of employees designated and assembled to respond to a Disaster or emergency. The DTE Emergency Response Team consists of the following employees:

1. General Manager
2. Operations Manager
3. Plant Supervisor
4. Engineering Manager
5. IT Supervisor
6. Controller

III. DISASTER /EMERGENCY RESPONSE

A member of the Emergency Control Committee (ECC) shall be contacted immediately upon the report of a Disaster or emergency and the following actions shall be taken:

- A. The Committee shall immediately establish the Emergency Control Center and reroute communications as appropriate to this location.
- B. Contact Federal, State of Colorado PUC, and/or Wyoming PSC, City and County authorities

- C. In the event of land-line failure, mobile communications shall be arranged at the Emergency Control Center.
- D. The Committee shall use Email and/or mobile text messaging capability (as available) in the event that voice communications are unavailable.
- E. As soon as it is safe to do so, the Committee shall arrange and dispatch the appropriate resources for restoration of any damaged facilities.
- F. Restoration of essential communication services shall be completed in the following order:
 - 1. "Emergency Services" to include 911 service and local law enforcement, fire department and search and rescue departments.
 - 2. "Essential Services" to include hospitals, doctors offices, medical centers, etc., TOLL trunks and trunk circuits to include mobile phone service trunking.
 - 3. "Public Customer Services" to include city, county, state and federal facilities including schools.
 - 4. "Business Customer Services" to include large and small business customers
 - 5. "Residential Customer Services" to include all remaining communication services

SECTION 2 SERVICE RESTORATION RESPONSE

I. PURPOSE

Section 2 provides a Service Restoration Response in the event of a major outage. A major outage is defined as any event resulting in a simultaneous disruption of service to ten (10) or more communications customers in an exchange area.

II. PERSONNEL

DTE personnel within the following departments will be assigned duties as described in Section 2, and are responsible for assuring completion of the Service Restoration Response Process.

ALL	Includes all Personnel
ADMINISTRATION	Includes all Management Personnel
OPERATIONS	Includes all Operations & Engineering Personnel
IT/IS	Includes all Information Technology, Information Services and Internet Personnel
COMMERCIAL	Includes all Finance & Customer Service Personnel

III. RESTORATION RESPONSE AND RESPONSIBLE PERSONNEL

- A. Switch Disaster (Voice Switching)** - In the event of a loss of circuit switching capabilities due to a disaster or emergency, OPERATIONS shall immediately inform ADMINISTRATION and COMMERCIAL and proceed to contact the Switch Administrator at DTE noted on the supplies and contractors list here to attached as Exhibit A, the cause of the outage and coordinate restoration efforts. Both ADMINISTRATION and COMMERCIAL shall be informed upon successful restoration of the Circuit Switch.
- B. Trunking and Interconnection Disaster (Transmission Systems)** – In the event of a loss of trunking and interconnection services related to a SONET Systems failure caused by a Disaster or emergency, OPERATIONS shall immediately inform COMMERCIAL and proceed to coordinate efforts with the Affiliated Companies listed in attached Exhibit B, to determine the cause of the outage, and take actions as outlined in the “Fiber Optic Network Affiliate Agreement, Attachment B – Operations and Maintenance”. COMMERCIAL shall be informed upon successful restoration of the SONET System.
- C. Trunking and Interconnection Disaster (Cable Systems)** – In the event of a loss of trunking and interconnection services related to a cable systems failure caused by a disaster or emergency, OPERATIONS shall immediately inform COMMERCIAL and proceed to coordinate efforts with the affiliated

companies listed in Exhibit C, hereto attached, as defined in the Fiber Facilities Operation and Maintenance Agreement to determine the cause and location of the outage, and take subsequent restoration actions as defined in the Fiber Facilities Restoration Plan. COMMERCIAL shall be informed upon successful restoration of the cable system.

- D. Commercial AC Power Disaster** - In the event of a loss of Commercial Alternating Current (AC) power caused by a disaster or emergency, OPERATIONS shall immediately confirm the functionality of emergency standby generator systems and then inform ADMINISTRATION of the situation, proceeding to contact the appropriate utility company as identified in the Suppliers & Contractors list, as attached as Exhibit B, to determine the cause of the outage. If Commercial power cannot be restored within a reasonable time, emergency standby generator systems shall be monitored regularly to assure continued power to the DC power systems and backup batteries.
- E. DC Power Systems and Backup Battery Disaster** - In the event of a loss of Direct Current (DC) power systems caused by a disaster or emergency, OPERATIONS shall immediately coordinate efforts to determine the cause of the outage. If DC power cannot be restored due to rectifier failure or destruction, OPERATIONS shall contact Thermobond Buildings as noted in the Suppliers & Contractors List attached as Exhibit B to coordinate restoration, repair or replacement with the power equipment vendor.
- F. Off-Net Private Line and Special Circuits Disaster** - In the event of a loss of Private Line and Special Circuits provided by an off-net carrier due to a disaster or emergency, OPERATIONS shall immediately contact the off-net carrier to determine the cause of the outage. Upon determining the cause of the outage and the estimated restoral time, OPERATIONS shall inform COMMERCIAL of the circumstances. COMMERCIAL will relay the appropriate information to the customer or end user.
- G. Long Distance Service Disaster** - In the event of a loss of Long Distance service as a result of a disaster or emergency, DTE shall immediately contact ACT, Vision Net, and/or Centurylink as noted in the attached Suppliers & Contractors List to report such outage and to coordinate restoration or repair.
- H. Internet Service Disaster** - In the event of a loss of Email or web service access due to a disaster or emergency, DTE shall immediately contact ACT and/or Vision Net as noted on the Supplies & Contractors List as Exhibit B, to assist in identifying the cause of the loss of Email or Web service and inform COMMERCIAL of the outage and approximate time to restore service. COMMERCIAL will relay the appropriate information to the customer or end user.

- I. Digital Subscriber Line Access Multiplexer (DSLAM) and Digital Loop Carrier Systems (DLC) Disaster** – In the event of a loss of DSL and/or voice services relating to a DSLAM or DLC Disaster or emergency, OPERATIONS shall immediately work to determine the cause of the outage. If determined necessary OPERATIONS shall contact the appropriate vendor as noted on the Supplies & Contractors List, Exhibit B, to repair or replace the damaged equipment, and inform COMMERCIAL of the outage and approximate time to repair. COMMERCIAL will notify the customer or end user.
- J. Operations Support Systems (OSS)** – In the event of a loss of Operations Support Systems relating to a disaster or emergency, IT shall be immediately contacted to determine the cause of the outage. COMMERCIAL and ADMINISTRATION shall be informed of the outage and coordinate with the IT Coordinator to determine how long it will take to repair or replace the damaged OSS equipment or Wide Area Network (WAN) connectivity.

SECTION 3 COMMUNICATIONS AND COORDINATION

I. PURPOSE

Section 3 provides general guidelines for inter-departmental communications and coordination in the event of a disaster or emergency. These guidelines are intended to complement, not supersede, DTE's existing work procedures. All actions outlined in this section are intended to expedite the repair and restoration of communications services to the community affected by the disaster or emergency.

II. COORDINATION AND STAFFING

Emergency staffing needs and employee scheduling will be determined by the Emergency Control Committee who shall coordinate all restorations and repair oversight from the Emergency Control Center.

Emergency Control Committee responsibilities include the following:

1. Establish a temporary 911 Public Safety Answering Point (PSAP), if necessary
2. Coordinate all communications between restoration and repair personnel
3. Direct and dispatch restoration and repair personnel and all other resources as necessary
4. Provide continued updates to DTE management personnel and affiliated company management personnel if emergency impacts services delivered in affiliated company areas.
5. Accumulate, evaluate and direct customer trouble reports as necessary to appropriate restoration personnel
6. Inform and update local authorities of communication restoration status.
7. Advise answering service of the nature and estimated duration of the service disruption.
8. Coordinate the availability of mobile communications as required
9. Coordinate the availability of network records as required

A. ADMINISTRATION responsibilities include the following:

1. Assist the Emergency Control Committee as requested
2. Control media and coordinate the delivery of General Manager press releases
3. Notify regulatory agencies as required (Public Service Commission)

B. OPERATIONS responsibilities include the following:

1. Establish communications between the nearest location to the disaster or emergency and the Emergency Control Center

2. The first responding OPERATIONS employee shall serve as the Field Coordinator and shall be the single point of communications between the location of the disaster or emergency and the Emergency Control Center until a supervisor or manager can be dispatched to the location
3. Perform all restoration and repair work in the affected area(s)

C. IT/IS responsibilities include the following:

1. Establish communications between the nearest location to the disaster or emergency
2. The first responding IT employee shall serve as the Field Coordinator and shall be the single point of communications between the location of the disaster or emergency and the Emergency Control Center until a supervisor or manager can be dispatched to the location
3. Initiate immediate action to restore affected Internet hardware including routers and switches
4. Perform all restoration and repair work in the affected area(s)

D. COMMERCIAL responsibilities include the following:

1. Establish communications between the contract answering service as noted on the Supplies & Contractors List, attached as Exhibit B, and the Emergency Control Center
2. Communicate the status of the disaster or emergency to the contract answering service
3. Communicate the status of the disaster or emergency to customers reporting service outage
4. Record all customer reports on service outage and forward to the Emergency Control Committee for the appropriate action
5. Assist the Emergency Control Committee with customer calls to confirm restoration of service
6. Provide assistance as requested by the Emergency Control Committee

EXHIBIT A SUPPLIERS & CONTRACTORS

I. PURPOSE

Exhibit A provides contact information for those Suppliers & Contractors providing support services to DTE.

A. Internet Wholesale Suppliers & Contractors

Advanced Communications Technology, Inc.

Dave Berry, Operations Manager

Office: 307-675-0922

Mobile: 307-431-9064

Emerg: 307-675-0998

B. Switching Network Support – Metaswitch

Scott Enderle, CSE 510-217-5181

Andy Finney, Support Manager (Escalations) 510-217-4474

Reston, VA NOC 703-480-0500

Alameda, CA NOC 510-748-8230

Emergency 800-308-8772

Bill Allen, Sales Manager 510-748-1829

C. Supply Chain Management & Contractors

Graybar Electric 800-876-5667

Border States Electric 800-736-6266

KGP Logistics 800-755-1950

Alamon Telco 800-252-8838

D. Power Suppliers & Contractors

High Plains Power 307-455-2475

Rocky Mountain Power 307-378-2470 or 888-221-7070

Action Battery Wholesalers, Inc- 715-247-5512

Thermbond (Marconi Power Systems) 800-356-2686

TW Enterprises (Generator Maintenance) 800-995-3795

Power Product Services 800-424-1928

E. Fuel Providers (Standby Generators)

Dubois Central Office: Crowheart Store 307-486-2285

Riverton Hut: Source Gas 800-568-0012

Ethete Hut: AmeriGas (Riverton) 307-856-3868

Pilot Butte Hut: AmeriGas (Riverton) 307-856-3868

Crowheart Office: V-1 Propane (Dubois) 307-455-2315, 307-450-9090

Togwotee Hut: V-1 Propane (Dubois) 307-455-2315, 307-450-9090

Baggs Central Office: AmeriGas (Craig, CO) 970-824-5423

DAD Hut: V1/AmeriGas (Rawlins) 307-324-5058

F. Excavation

	T-Y Construction	307-455-2479
G.	Wholesale Long Distance Suppliers & Contractors	
	Associated Network Partners, Inc-	217-698-1581
	Emergency	866-287-4835
H.	Back Office Internet Support	
	Vision Net (TAC)	866-624-6462
	Vision Net (Office)	406-467-4700
I.	Tier One ISP Connectivity – North Route	
	Vision Net (NOC)	866-624-6462
	Vision Net (Office)	406-467-4700
J.	Tier One ISP Connectivity – South Route	
	ZAYO (NOC)	800-609-1025
	ZAYO (Office)	503-309-6071
K.	Tier One ISP Connectivity – East Route	
	SDN Communications (NOC)	877-287-8023
	SDN Communications (Office)	800-247-1442
L.	CISCO Routers, Switches and Firewalls	
	CISCO (TAC)	800-553-2447
M.	Broadband Loop Carrier/Digital Loop Carrier Network Support	
	Calix (TAC)	777-766-3500
	Calix Escalation	612-360-1426
	Paradyne	403-235-4271
	Telstrat	888-658-8572
	Tellabs	800-690-2324
	Adtran (TAC)	256-963-8716
N.	SONET / DWDM Network Support	
	Fujitsu (TAC)	800-873-3822
	Fujitsu Escalation	303-889-9494
O.	Microwave Network Support	
	Alcatel	888-252-2832
P.	Carrier Ethernet Network Support	
	CYAN (TAC)	800-873-3822
	CYAN Escalation	303-889-9494
Q.	Engineering Consultant (MidState)	435-623-8601

R.	Network Innovations (MSAT 2-way radio)	888-842-2914
S.	IT & Computer Supplies Tiger Direct (Scott Cannon)	877-998-8534
T.	Billing Support System/Operations Support System (BSS/OSS) Jim Klein, IT Supervisor (Office) Jim Klein, IT Supervisor (Mobile)	406-347-2226 406-351-1944
U.	Wireless Service Providers Union Wireless Commnet Wireless/Verizon Extended	307-782-6131 720-733-7854
V.	Interconnecting Carriers Century Link Silver Star Communications MCI/Verizon	888-678-8080 307-883-2411 916-576-6831
W.	Safety Services Clark Safety & Loss	406-259-6154
X.	Alarm Monitoring and After Hours Customer Support Vision Net (TAC) Vision Net (TAC Manager Mobile)	866-624-6462 406-590-4690

**EXHIBIT B
AFFILIATED COMPANIES**

I. PURPOSE

Exhibit B provides contact information for those companies affiliated with Dubois Telephone.

Range Telephone Cooperative, Inc.

2325 E. Front Street
Forsyth, Montana 59003

Office:	406-347-2226
Office:	800-927-2643
Fax:	406-347-2410
Emerg:	406-347-2226

Advanced Communications Technology, Inc.

290 N. Brooks Street
Sheridan, Wyoming 82801

Office:	307-673-0910
Office:	888-304-8889
Fax:	307-675-0974
Emerg:	307-675-0900

RT Communications, Inc-

130 S- 9th Street
Worland, Wyoming 82801

Office:	307-347-7000
Office:	800-647-9841
Fax:	307-347-9200
Emerg:	307-347-7666

EXHIBIT C OTHER CONTACTS

I. PURPOSE

Exhibit C provides contact information for entities that should be or may need to be contacted should an emergency situation arise at DTE, **CALL 911!**

LAW ENFORCEMENT OFFICES

Fremont County Sheriff's Office	307-856-7200
Riverton Police Department	307-856-4891
Dubois Sheriff's Office	307-455-2226
Bureau Indian Affairs Police	307-332-3112
FBI Lander	307-335-7559
Carbon County Sheriff's Department	307-324-2776
Baggs Police	307-383-6000
Wyoming Highway Patrol	800-442-9090
Colorado Highway Patrol	970-824-6501
Moffat Co. Sheriff's Department	970-824-4495
Routt Co. Sheriff's Department	970-879-1090
Wyoming Homeland Security	307-777-4663
After hours Duty Officer	307-777-4321
FCC 24/7 Operations Center	202-418-1122
Email	disasterassistance@fcc.gov

MEDICAL FACILITIES

Riverton Memorial Hospital	307-856-4161
Lander Regional Hospital	307-332-4420
Dubois Medical Clinic	307-455-2516
Kinder Family Clinic Baggs	307-383-2008
Carbon County Memorial Hospital (Rawlins)	307-324-2221
Memorial Hospital (Craig, CO)	970-824-9411
Yampa Valley Medical Center (Steamboat, CO)	970-879-1322

UTILITY COMPANIES

High Plains Power	307-455-2475
Rocky Mountain Power	307-378-2470 or 888-221-7070
Yampa Valley Electric Assoc. (Craig, CO)	970-824-6593
Questar Gas (Baggs, Little Snake River Valley)	800-767-1689

PRODUCER & PIPELINE AUTHORITIES

Anadarko Petroleum (Dad, Savery-North)	800-738-9816
Colorado Interstate Gas/El Paso (DAD, Wamsutter)	877-712-2288
Questar Pipeline (Little Snake River Valley)	800-767-1689
Plains Pipeline (Baggs, Wamsutter) parallel to fiber	866-800-7677
Williams Field Service (Dad, Wamsutter)	800-635-7400

FEDERAL LAND MANAGEMENT AGENCIES

Shoshone Nat'l Forest (USFS) Wind River District	307-455-2466
Bridger-Teton National Forest (Buffalo District)	307-543-2386
Bureau Land Management Lander Office	307-332-8400
Medicine Bow-Routt National Forest (Supv Office)	307-745-2300
Bureau Land Management Rawlins Office	307-328-4200
Bureau Land Management Craig, CO. Office	970-826-5000

OTHER COOPERATING PARTNERS and AGENCIES

National Weather Service (Riverton)	307-857-3898
WYDOT (Dubois)	307-455-2434
Wind River Indian Reservation	
Eastern Shoshone Tribe	307-332-3914
Northern Arapaho Tribe	307-335-8100
Bureau of Indian Affairs (Supt)	307-332-7810
KCWC Public Television	307-856-6944
KUWR Public Radio (Engineering)	307-766-3531

MUNICIPALITIES

Town of Dubois	307-455-2345
Town of Baggs	307-383-2888

EMERGENCY SERVICES

Dubois Volunteer Fire Department Hall	307-455-2212
Crowheart Volunteer Fire Department Hall	307-486-2221
Baggs Volunteer Fire Department Hall	307-324-2776
Fremont Co. Emergency Services	307-856-2374
Carbon Co. Emergency Services	307-328-2750
American Red Cross Colorado	800-272-6668
American Red Cross Wyoming	307-638-8906
Center for Disease Control	800-232-4636
Poison Control	800-222-1222

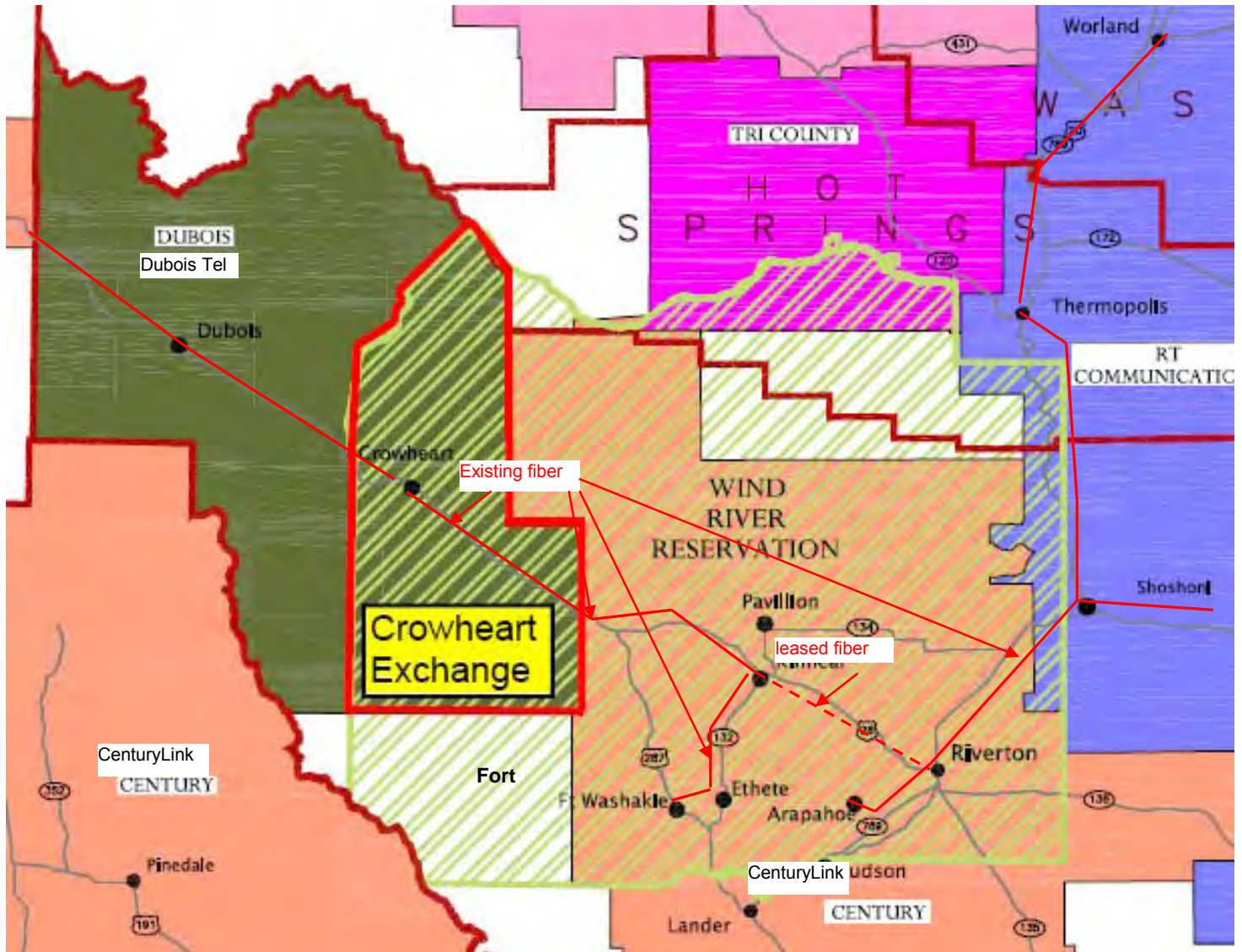
BURIED CABLE LOCATION SERVICE

Colorado One Call	800-424-5555
Wyoming One Call	800-849-2476
Wyoming Road Report	
Inside Wyoming dial 511, outside Wyoming	888-996-7623
Colorado Road Report	
Inside Colorado dial 511, outside Colorado	303-639-1111

Tribal Engagement Summary 2016

Dubois Telephone Exchange, Inc. (DTE)

The Wind River Reservation (*see map below*) is approximately 2.2 million acres in size, and is home to the Eastern Shoshone and Northern Arapaho Tribes. Reservation land categories include a mixture of Tribal Trust, Tribal Allotted, Bureau of Reclamation withdrawal/ceded, and deeded or fee lands owned mostly by non-Tribal residents. Each Tribe has a ½ undivided interest in all Tribal Trust Lands.



Primary Reservation Communities

Fort Washakie. Ft Washakie is home to most Tribal and Federal government entities serving the Reservation, including the ESBC, JBC, BIA, Indian Health Service (IHS) Clinic/Hospital, Ft Washakie School, Tribal DEQ, USFW, Housing Authorities, Law Enforcement, and various Eastern Shoshone Tribal enterprises. Ft Washakie is about 7 miles from the Eastern Shoshone Tribe's Shoshone Rose Casino.

Ethete. Ethete is home to the NABC, the Wind River Tribal College, Little Wind Casino (Northern Arapaho Tribe), Wind River Indian High School, Ethete Middle School, and various Northern Arapaho Tribal enterprises.

Arapahoe. Arapahoe is home to an IHS clinic/hospital extension, Arapahoe School and various Northern Arapaho Tribal enterprises. Arapahoe is about 5 miles from the Northern Arapaho Tribe's Big Wind Casino. (*note: Arapaho are the "people"; and Arapahoe is the "place".*)

Crowheart. Crowheart serves primarily as a gathering place for rural residents living in the far western part of the Reservation.

The communities of **Kinnear, Pavillion and Riverton** are located on ceded Reservation land. Even though they are located within the exterior boundary of the Reservation, they are not subject to Reservation authority. Riverton (pop est 10,000) is the commercial hub of Fremont County. Many Reservation residents do their shopping in Riverton, seek additional medical attention; and due to a shortage of housing elsewhere on the Reservation, seek housing in Riverton.

Dubois Telephone Exchange Reservation Serving Area

Dubois Telephone Exchange, Inc. (DTE) serves the Crowheart Exchange, a small portion of the western part of the Wind River Reservation, (*see map*). The small community of Crowheart is not an incorporated town, but rather a gas station/post office, small grocery store and trading post. Nearby is the small Crowheart Elementary school (enrollment 7), and Big Wind Hall (Eastern Shoshone Tribe), which includes a senior center, community center and library. Crowheart serves as a community gathering place for area ranches, farms and home sites. Most residents live along Highway 26/287 and rural roads along either side of the highway. The majority of the Reservation in DTE's certificated serving area is undeveloped Tribal Trust range land, forest and wilderness.

DTE serves 100 access lines (78 Res & 22 Bus) in the Crowheart Exchange. This number has remained relatively stable for the last 15 years. There are currently 74 broadband subscribers. The Crowheart Exchange is a mixture of Tribal Trust, Allotted and Deeded (non-Reservation) lands. The population makeup is estimated 40% Native American and 60% non-Native.

The primary anchor institutions important to Tribal residents are the Crowheart Elementary School and the Big Wind Hall. Both locations are connected to Fiber optics and have broadband capabilities in excess of 10mb.

Tribal Engagement Obligations Ongoing

Since the fiber optic infrastructure was lit in 2006, DTE and Advanced Communications Technology (*ACT, the Range Family CLEC*) have continued working with both Tribes to bring Tribal government services and various entities on line. A summary of key institutions and locations to date that have fiber optic connectivity and **broadband service** or have **services pending** include:

Fort Washakie

- Joint Tribal Minerals Management (**broadband service**)
- Joint Business Council Headquarters (**broadband service**)
- Eastern Shoshone Business Council Headquarters (**broadband service**)
- Shoshone Tribal Credit Union (**broadband service**)
- Frank B Wise Entrepreneurial Center (**broadband service**)
 - Wind River Development Fund
 - Shoshone Tribal Attorney General
 - UWyo outreach
- IHS Headquarters/Hospital (**broadband service**)
- Shoshone Tribal Clinic (**broadband service**)
- BIA Headquarters (**broadband services pending regional request**)
- BIA Law Enforcement (**broadband services pending request**)
- Wind river Dialysis Center (**broadband services pending**)
- Ft Washakie School/Library (**broadband service**)
- Eastern Shoshone Child Support Services (**broadband service**)
- Hines General Store & Shops (**broadband service**)
- CWB&T Branch Banking Service (**broadband service**)
- Morning Star Manor Nursing Home (**broadband service**)
- Tribal Employment Rights Office (TERO) (**broadband service**)
- Tribal Forestry (**broadband services pending request**)

Ethete

- Little Wind Casino (**broadband service**)
- Wind River Tribal college (**broadband service**)
- Northern Arapaho Business Council Headquarters (**broadband service**)
- Wind River Indian High School (**broadband service**)
- Ethete Middle School (**broadband service**)

Arapahoe

- Arapahoe School (**broadband service**)
- IHS Hospital/Clinic extension (**broadband service**)
- St Stephens High School (**broadband service by NATI**)
- NATI (Northern Arapaho Tribal Industries) Headquarters (**broadband service**)

Crowheart

- Big Wind Hall/Community Center & Library (**broadband service**)
- Crowheart Elementary School (**broadband service**)

Dubois Telephone Exchange, Inc (DTE) Tribal Engagement Record 2016

Even though DTE's certificated serving area covers only the far western part of the Wind River Indian Reservation, DTE and ACT made a commitment during the fiber project through the Reservation, to assist both Tribes and various entities when they have communications questions anywhere on the Reservation. DTE's General Manager routinely visits with Tribal Leaders, the BIA and others who request meetings to talk about communications issues; or via casual drop-in visits when traveling through the Reservation. DTE Engineering and Construction staff serve as primary Tribal contacts when working with ACT to provide telecommunications and broadband services to Tribal Entities outside DTE's Reservation serving area.

2016 Highlights

Important 2016 update

In February, The Northern Arapaho Tribe (NAT) filed a lawsuit in federal court contending that the BIA and Eastern Shoshone Business Council (ESBC) were undermining the sovereign authority of the NAT. (see Exhibit III). Exhibit IV is a response to the lawsuit by the ESBC.

In May 2016, The NAT dismissed their lawsuit against the BIA and members of the ESBC. Lawyers for the BIA are entering into mediation with the NAT to resolve remaining issues.

Heightened antagonism and legal challenges between the two Tribes has brought permitting of various activities on the Reservation to a virtual standstill.

HISTORY

On September 9, 2014, the Northern Arapaho Business Council (NABC) sent a letter to Tribal members announcing the dissolution of the Joint Business Council. (see Exhibit I). On September 29, 2014, the Eastern Shoshone Business Council (ESBC) issued a press release rejecting the dissolution of the JBC (see Exhibit II). Exhibits III and IV illustrate continuing differences between the two Tribes.

Prior to the September actions by both Tribes, activities on the Reservation were governed by a Joint Business Council (JBC) comprised of individual ESBC and NABC Business Council members. The JBC worked in partnership with the Bureau of Indian Affairs (BIA) in matters of Trust and Fiduciary responsibilities; and with each other in matters that affected the Tribes individually or jointly.

DTE understands that any entity proposing a project on the Reservation, that affects or benefits one Tribe or both Tribes, must now seek approval and resolution from each Tribe's Business Council separately. What is unclear at this time is the role the BIA and/or each Tribe (individually) may have in granting utility rights of way or licenses.

There will be additional challenges working with each Tribe individually, but DTE remains committed to working with both Tribes to expand access to broadband services.

Routine Activity

- FTTX upgrade for Tribal and non-Tribal locations along the Burris-Lenore Road (DTE Exchange 486)
 - One Tribe has accepted offer of compensation for R/W takings along the road; the other Tribe has not
 - Project on hold for almost 2 years now.
- Continue courtesy communications with Adam Patrick Lawson, GM of Wind River Internet, a Northern Arapaho Tribal Industries (NATI) company that provides last mile wireless broadband to businesses and residents of the Wind River Indian Reservation (WRIR).
 - Available to share information about existing facilities on Reservation that may be useful as NATI constructs their own fiber optic facilities.
- Continued courtesy visits and conversation with John Brown, IT manager for Shoshone Tribe. Provide background of Range Family facilities and services on the Reservation available to assist with Shoshone Tribal technology plans.
- Courtesy visit with Cy Lee, Executive Director of the Wind River Development Fund (WRDF). Discussions about building fiber optics to more Tribal locations
- Continue courtesy meetings and updates with IT managers for Wind River Indian/Ethete Middle School, Fort Washakie Elementary School and Arapahoe School to discuss additional bandwidth needs, help relocate/repair fiber facilities and provide engineering advice for pending new schools construction.
 - Facilitated major reroute of temporary fiber services and placement of permanent fiber facilities for new Fort Washakie school construction
 - Assisted with reroutes and assorted technology issues for Ethete Middle School and Wyoming Indian High School
 - Provide maintenance and repair of school owned fiber from Wyoming Indian HS to Wyoming Indian Elementary
- Courtesy and Engineering visits to Ft Washakie (working with ACT) to advise and design service options for Shoshone Tribal Credit Union, Tribal Housing, Shoshone Tribe Clinic, Tribal law enforcement, Wind River Dialysis center, Morning Star Care Manor, Child Support Services, Hines store and shops, Central Bank & Trust-Fort Washakie Branch. Provided recommendations and alternatives that could save on construction costs. Also recommended Tribal entities ask local Wireless company-Wind River Internet for a bid to provide service.
- Testified before the **Wyoming Legislature Select Committee on Tribal Relations** in June 2016 about the state of Broadband Connectivity on the Reservation (ACT & Range Family); and more specifically the Crowheart area of the Reservation which is served by DTE. Participated in discussions about synergistic efforts between DTE, ACT, Union Wireless and CenturyLink to work with Tribal communications companies to enable enhanced services to Tribal businesses and residents.
 - Opportunities for visits and updates with Patrick Adam Lawson, GM Northern Arapaho Tribal Industries, Richard Brannon, Northern Arapaho Business Council member & CEO of Wind River Family and Community Clinic and Leslie Shakespeare, EST Liaison.
- Co-hosted a dinner meeting with Northern Arapaho Tribal Liaison, Sergio Maldonado and Eastern Shoshone Tribal Liaison, Leslie Shakespeare; and The Foundation for Rural Service (FRS) Congressional staff tour at Riverton Library, August 2016. The Liaisons shared their telecom story and the multitude of challenges, from cultural to geographic to technological, they face daily. Congressional staffers asked good questions and hopefully gained some insight to various issues affecting the Reservation.
- Provided general DTE staff assistance throughout the period for equipment recommendations and configurations, trouble shooting problems, cost estimates for various planning scenarios.
 - Worked with ACT to construct fiber facilities to Morning Star Manor and Shoshone Tribal Clinic for improved broadband service.
 - Worked with ACT to install wireless Ethernet to TERO Office, Hines General Store, Child Support Services and Central Bank & Trust-Ft. Washakie Branch.
- DTE Front Office Staff and GM worked with individual Tribal customers served by DTE in the Crowheart area to insure compliance with Lifeline requirements
- TERO assessments and license current TERO License #2016-00376 (see Exhibit V)

Summary

The expansion of fiber optic connectivity, beyond DTE's serving area, and across the Wind River Reservation, to the Range Family fiber network necessitated broader participation and dialogue with the Eastern Shoshone and Northern Arapaho Tribes. Building trust with the Tribes is a slow and deliberate process. Tribal engagement is a necessary and ongoing process to maintain that trust. In summary, working with the Tribes has created a win-win, for the Reservation, for DTE and for the Range Family of companies.

EXHIBIT I

Northern Arapaho Business Council

P.O. Box 396

Ft. Washakie, Wyoming 82514

Phone: 332-6120 — 332-5006 - 307-856-3461

September 9, 2014



Dear Members of the Northern Arapaho Tribe,

The Northern Arapaho Business Council (NABC) today dissolved the Shoshone and Arapaho Joint Business Council (JBC). It is now the policy of the Northern Arapaho Tribe (NAT) to cooperate with the Eastern Shoshone Tribe (EST) through existing committees or other methods.

This is a proud and historic moment for our Tribe. Eliminating the JBC is a big step toward greater self-government and independence, something the NAT has been working toward for many years.

The JBC was never part of our traditional tribal government. It was created by the federal government for its own convenience. Neither Tribe's General Council approved the JBC. For decades, the JBC has hobbled both tribal governments, created barriers to development, and wasted time that could have been spent on Northern Arapaho issues.

Outsiders used the JBC against the Tribes. For example, some federal agencies used the JBC like the federal government once used the historic treaty councils, to restrict the flow of information to tribal leaders and use internal disagreements and other questionable methods to gain advantage over tribes.

The NAT worked patiently to make this broken system to work. But after more than half a century of JBC dysfunction, the NABC voted to move forward as the sovereign government that it is.

Dissolution of the JBC should take no one by surprise. The Tribe moved its headquarters from Ft. Washakie to Ethete in 1989, established its own housing department in 1996, and established gaming and gaming laws separately from the EST. Removing the yoke of the JBC is just the latest step in a long march toward greater independence and self-government.

Most tribal members will notice little difference in day-to-day government function, except perhaps quicker responses to homesite lease requests and other matters that frequently got stuck in JBC. Joint tribal programs will function with oversight from joint committees and approval from each Business Council.

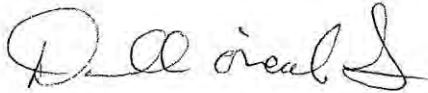
September 9, 2014

Page 2

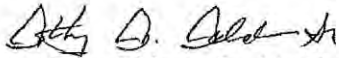
The change will have little impact on federal matters, including the Tribes' application for "Treatment as a State" (TAS) under the Clean Air Act. But perhaps the congressional delegation will stop asking, "Where is the JBC?" when Northern Arapaho leaders request a meeting in private.

Ultimately, the dissolution of JBC will send a powerful message of tribal sovereignty to the federal and state governments. It will improve our chances of success in the future. This is an important moment in Northern Arapaho history. It is a time to celebrate, and to honor the wisdom and hard work of our forebears who made this possible.

Sincerely,



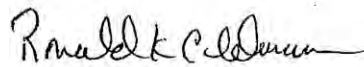
Darrell O'Neal, Sr., Chairman



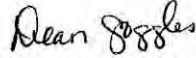
Anthony Addison, Sr., Member



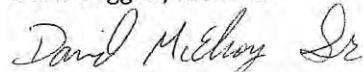
Willard Gould, Member



Ronald K. Oldman, Co-Chairman



Dean Goggles, Member



David McElroy, Sr., Member



EXHIBIT II

*Eastern Shoshone Business Council
P.O. Box 538
Fort Washakie, WY 82514
(307) 332-3532/4932
Fax: (307) 332-3055*

FOR IMMEDIATE RELEASE

Eastern Shoshone Tribe Rejects Risky Arapaho Plan

Fort Washakie, WY - September, 29 2014 – Earlier this month the Northern Arapaho Tribe (NAT) announced their resignation from the Shoshone and Arapaho Joint Business Council (JBC), a move that relinquished their management authority of joint resources to the Eastern Shoshone Tribe (EST), and affected the Shoshone Tribe's Sovereign and treaty right to manage Joint resources.

EST received and rejected a proposition from the Northern Arapaho Business Council (NABC) to join NABC in issuing separate Tribal resolutions to approve Joint Business Council actions, without discussion or any communication between the two Tribes. After The Northern Arapaho Tribe abandoned the JBC process over two weeks ago, Eastern Shoshone issued a letter to Northern Arapaho and federal funding partners that EST does not consent to altering the joint-process for JBC actions and doesn't recognize the NAT's proposal for management decisions on joint issues.

"The Shoshone Tribe will decide how and when we make decisions regarding our Sovereignty, Treaty and Reservation interests and we agreed to do that with NAT in the JBC process. Both our predecessors agreed to and operated JBC for over seventy-five years. Now that NAT backed away from their responsibilities, we have no choice but to protect the Eastern Shoshone's interests from waste, fraud, abuse. We will take all necessary steps to preserve our Sovereignty, Treaty Rights, investments, operations and structures," said Shoshone Business Council Chairman Darwin St. Clair Jr. "Our view is the Joint Business Council never was a Joint Powers Board as referred to by the NABC. There is a history of legislative and Sovereign protection that have benefited all tribal members and upheld land, water and air issues that are important to not only Wind River but Indian Country."

EST's concern focuses on the absolute absence of productive and thoughtful planning that the Tribes would need to alter their current structure and still effectively manage joint assets and resources because there are implications across the board. The Eastern Shoshone call NAT's actions ill-conceived and ill-timed, but also contradictory in nature. "NABC announced this 'historic' change and then in the same breath said nothing changes at all," expressed Chairman St. Clair.

Because of the complete lack of communication from NAT and choice to forego government-to-government discussions, EST responds that from what it can gather from NAT's various media releases and the single-page letter SBC received, the Arapaho-proposed changes fail to protect EST's joint resources and interests. "If the Northern Arapaho choose to hire non-

Indians to make decisions for their Tribal Council, that's an internal issue for their government. However, the Shoshones will only make decisions regarding its mutual resources on a government-to-government basis. If the management group Arapaho hires is authorized to bind the Arapaho Tribe in JBC, that's NABC's decision," says SBC Co-Chairman Clinton Wagon. "This process they talk about is barely a plan and it offers no protection to the Eastern Shoshone Tribe."

Because the two Tribes must agree to change their decision making process, and because the NAT resigned from participating in JBC without any formal change, the Eastern Shoshone will maintain the JBC and provide direction, oversight and control over all JBC programs until the Eastern Shoshone Tribe agrees to make any changes.

The Eastern Shoshone Tribe is a federally recognized Tribe and Treaty Tribe of the 1868 Fort Bridger Treaty establishing the Wind River Reservation.

Contact:
Misty Mann - Executive Secretary
Shoshone Business Council
Eastern Shoshone Tribe
Fort Washakie, WY
(307) 332-3532
mistymann@e-shoshone.com

#

EXHIBIT III

Northern Arapaho Business Council

P.O. Box 396

Ft. Washakie, Wyoming 82514

Phone: 332-6120 — 332-5006 - 307-856-3461

February 26, 2016



A MESSAGE FROM THE NORTHERN ARAPAHO BUSINESS COUNCIL

In January 1937, the United States Supreme Court (*Shoshone Tribe v. United States*) concluded that the Federal Government had failed to meet its treaty obligations to both the Eastern Shoshone and the Northern Arapaho Tribes. In settlement of those failures, the United States was required to pay the Shoshone for divesting the Tribe of a 50% undivided beneficial interest in the Wind River Indian Reservation. The Shoshones looked upon the presence of the Northern Arapaho as an encroachment of their rights, for which they were entitled to be paid. The Supreme Court recognized that the Northern Arapaho had an "equality of right and privilege" with that of the Shoshone. When the Shoshone Tribe insisted that the Northern Arapaho could not participate in a council to decide about reservation projects, the United States said the Northern Arapaho did indeed have equal rights and can participate in matters affecting the reservation generally. Each time the Shoshone "protested that the Arapahoes were intruders... the [United States] government dealt with the two tribes as lawful occupants and equals." The Shoshone Tribe had no greater rights than the Northern Arapaho.

The United States paid the Shoshone Tribe in full for all of their claims arising from the Northern Arapaho presence on the reservation, which is now the reservation for each Tribe.

This is settled law. It wasn't consistent with the promises made to either Tribe, but the conclusion that both Tribes would remain on the Wind River Reservation, with a 50% beneficial interest to both Tribes was decided by the highest court in the United States.

In 1938, both the Northern Arapaho and Shoshone Business Councils, acting as two separate, independent sovereign Indian Tribes agreed to meet together to discuss the management of shared assets, real estate, minerals and program management which would benefit the membership of both Tribes. This was done for the convenience of the federal government. When the United States tried to push a constitution onto the Tribes, both

rejected it. Now, the Chairman of the Shoshone Business Council argues that the constitution which was rejected by the Shoshone General Council is valid.

In 1995, the Northern Arapaho formed its own housing authority. The Shoshone Tribe sued the Northern Arapaho, arguing that the Northern Arapaho could not form its own housing program and that the Northern Arapaho could not operate independently in matters affecting the Reservation. The Federal Court decided that the Northern Arapaho could form its own housing authority and the Shoshone theory that there was a "common sovereignty" was rejected. The decision ended up benefitting both Tribes.

In 2000, the State of Wyoming argued in the Northern Arapaho gaming case that Wyoming was not required to negotiate with only one of the Tribes on the Reservation; rather they should only be required to negotiate with both Tribes, acting jointly. The Federal Court concluded that the State of Wyoming could be required to negotiate gaming compacts with each Tribe separately.

In 2014, the Northern Arapaho concluded that the Joint Business Council was no longer workable. The joint programs were not being properly managed, and on this, both Business Councils agree. The lease and royalty agreements between the Tribes and oil and gas companies were not being negotiated in the best interests of either Tribe. Decisions about home site leases, farm and pasture leases, range unit leases and other business decisions were not being made in a timely way. Again, on these issues, both Business Councils agree.

Despite the clear legal authority for the Northern Arapaho to dissolve its participation in the Joint Business Council and exercise its own sovereign authority, the Shoshone Business Council and the Bureau of Indian Affairs have worked together to force the Northern Arapaho back into the failed Joint Business Council setting.

The Northern Arapaho have made several unsuccessful attempts to reach a memorandum of agreement (MOU) with the Shoshone to manage shared programs. The Northern Arapaho asked the BIA to assist in bringing the Shoshone to the table to mediate a management solution, all to no success.

Now the BIA has conspired with the Shoshone Business Council to violate Northern Arapaho sovereignty and force the members of the Northern Arapaho Tribe under the

authority of the Shoshone Business Council. The BIA has granted full control over contracts for the shared tribal programs to the Shoshone Council, acting under the name of the former joint council.

The Shoshone Business Council is also attempting to interfere with the Tribal Court. The Courts on the Wind River Reservation have a long history of independence and fairness, no matter which Tribe we belong to. The Shoshone Business Council has unilaterally, and without the permission of the Northern Arapaho, advertised for a variety of job openings, including the job of the long-time and highly respected Chief Judge, who is a member of the Shoshone Tribe.

The Shoshone Tribe, in cooperation with the BIA, has done everything it could to undermine the sovereign authority of the Northern Arapaho Tribe. Now, the Business Council has made a decision to file suit in Federal court to stop a series of illegal and wrong actions by both the BIA and the Shoshone Business Council. This decision was not made lightly, and only after attempting numerous times to reach an acceptable compromise.

Some in the Shoshone Council make the same old arguments they have lost time and again. The Federal Courts know we have an "equality of right and privilege" on this reservation, our home. It is unfortunate, but we must fight to protect our sovereignty and independence.

Dean B. Goggles, Chairman

Ronald K. Oldman, Co-Chair

Darrell O'Neal, Sr., Member

Ben S. Ridgley, Member

Ryan Spoonhunter, Member

Norman P. Willow, Sr., Member

EXHIBIT IV

Eastern Shoshone Tribe Will Continue to Manage Joint Programs and Will Vigorously Defend its Sovereignty

Ft. Washakie, Wyoming February 25, 2016 - The Eastern Shoshone Tribe as a party to the Fort Bridger Treaty of 1868, has sovereign authority to manage the resources and assets of the Shoshone Reservation. Our people have inhabited the Wind River country from time immemorial and our ancestors negotiated with the United States to establish the Warm Valley as a homeland for our people.

Because the federal government failed to uphold its treaty obligations, the Northern Arapaho were settled here. In 1938, the Eastern Shoshone Tribe allowed the Northern Arapaho to participate in the management of the resources of the Shoshone Reservation by creating the Joint Business Council (JBC). On September 10, 2014, the Northern Arapaho Business Council (NABC) withdrew from the JBC, by NABC Resolution No. 2014-428. However, JBC was not dissolved by their action. In their press release it was stated that there would be a “management team” comprised of three individuals who would improve the relations and process for management of jointly owned assets, this process never materialized as the Shoshone Business Council never met with this management team.

After months of grandstanding and assurances from Northern Arapaho leadership that we were “delusional” for maintaining our commitment to the Tribal Law and Order Code, and completion of 638 applications, the Bureau of Indian Affairs (BIA) awarded several self-determination contracts to the Shoshone and Arapaho Joint Business Council with management and oversight by the Shoshone Business Council. BIA’s award of the contracts and our management of the programs is consistent with the Law and Order Code of the Wind River Indian Reservation.

In 1987 the Shoshone and Arapaho Law and Order Code (SALOC) was adopted by both tribes as the legal document to protect and uphold the sovereignty and jurisdiction of the Wind River Indian Reservation. Included in the code are Tribal Court, Fish and Game, Tribal Water Engineer, Environmental Quality Commission, Tribal Employment Rights and other ordinances. The Shoshone and Arapaho Joint Business Council is the body referred to in the SALOC to oversee all aspects of the code.

The Northern Arapaho Business Council and its legal counsel have now challenged the BIA’s action and our management of the programs in their latest lawsuit. They seek to maintain the “status quo” and undo any reforms we have made. The status quo for joint programs however is no longer acceptable. A recent BIA review of the Tribal Court and the Joint Finance Office uncovered serious problems. We have responded by adopting corrective action plans that will improve accountability and effectiveness for those programs.

Many land management issues remain at a standstill including homesite leases, farm and pasture leases, business leases, range unit leases and other issues that affect members of both tribes. We, the SBC are willing to meet and address this backlog in our efforts to work in the best interest of tribal members.

We are discouraged that the Northern Arapaho Business Council have completely abandoned the tradition of Indian tribes dealing with one another directly instead of relying on attorneys and lawsuits to do the talking. By filing two recent lawsuits challenging BIA actions they have chosen to surrender their sovereignty to a federal district court in Montana and an Appeals Board in Washington D.C. We still welcome Northern Arapaho Business Council participation at JBC and we are committed to working together in a good way.

Despite the lawsuits and efforts to derail much needed reforms, we will fulfill our obligation and authority to protect, manage and administer all land, resources and assets within the exterior boundaries of the Reservation. The Eastern Shoshone Tribe will provide administrative oversight for the awarded self-determination contracts including the Tribal Court, Tribal Water Engineer and Tribal Fish and Game. The Eastern Shoshone Tribe will continue to explore options for maintaining other programs supported by self-determination contracts and grants.

Chairman Darwin St. Clair, Jr.

Eastern Shoshone Tribe

P.O. Box 538

Ft. Washakie, WY 82514



SHOSHONE and ARAPAHO TRIBES

Fort Washakie, Wyoming 82514



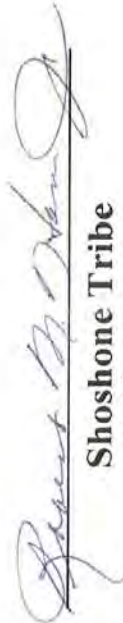
ISSUED TO

2016-00736

Dubois Telephone Exchange, Inc.

Issued this 30 day of April, 2016
Pursuant to Chapter 17 of the Law and Order Code of the Shoshone and Arapaho
Tribes to conduct business on the Wind River Reservation in compliance with all
applicable laws.

Authorization Period: January 01, 2016 To: December 31, 2016


Shoshone Tribe
Member


Arapaho Tribe
Member

Response to 1000
Line 1010
Dubois Telephone Exchange, Inc
Study Area 512291

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313(a)(10) Dubois Telephone Exchange, Inc., (“DTE”) is in compliance with the requirement that residential voice service is no more than two standard deviations above the national average urban rate for voice service of \$49.51 as specified in Public Notice DA 17-167 issued on February 14, 2017. DTE’s current total local end-user rates¹ for:

- Wyoming of \$32.17 (which includes a local fee of \$31.76 and a mandated state fee of \$0.41)
- Colorado of \$18.47 (which includes a local fee of \$18.00 and a mandated state fee of \$0.47); and
- Colorado Vacation service of \$9.23 (which includes a local fee of \$9.00 and a mandated state fee of \$0.23)

are not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

Response to 1000
Line 1030
Dubois Telephone Exchange, Inc.
Study Area 512291

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313(a)(12) Dubois Telephone Exchange, Inc., (“DTE”) is in compliance with the requirement that price of broadband services are no more than the most recent applicable benchmarks as specified in Public Notice DA 17-167 issued on February 14, 2017. DTE’s current pricing for each speed option compared with the applicable speed:

Download Speed (Mbps)	Upload Speed (Mbps)	Usage Allowance	Benchmark	DTE Price
10	1	Unlimited	\$77.98	\$45.00
30	10	Unlimited	\$93.49	\$55.00
50	20	Unlimited	\$100.52	\$85.00

Response to 1200
Line 1210
Dubois Telephone Exchange, Inc.
Study Area 512291

47 C.F.R. § 54.422(a)(2) Lifeline Terms and Conditions

See following pages of the Lifeline application form which describes terms and conditions for eligibility. Lifeline subscribers receive the same residential service as a regular subscriber, but at a reduced monthly recurring rate. Thus, lifeline subscribers have an unlimited number of local calling minutes. As for toll, lifeline subscribers, similar to every Dubois Telephone Exchange subscriber, are free to choose their own toll usage plans through IXC's that serve Dubois Telephone Exchange.

Lifeline Application Form

Lifeline allows customers to receive discounts of up to \$9.25 off their voice and broadband service rates if they meet program-based or income-based eligibility requirements.

Program-Based Eligibility Requirements – To be eligible for Lifeline using the program-based eligibility option, a customer must be on Medicaid, Supplemental Nutrition Assistance Program (SNAP), Federal Public Housing Assistance, Section 8 (FPHA), Veteran's Pension & Survivor Benefit, or Supplemental Security Income (SSI).

Income-Based Eligibility Requirements – To be eligible for Lifeline using the income-based eligibility option, the customer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size. Please see the income eligibility table on page 2.

Please fill in all information as completely as possible. In addition, please provide supporting documents to prove you meet the program-based or income based eligibility requirements. Information shared with the Company will be treated as confidential and will only be used to assess your eligibility for Lifeline.

Name (please print)

Telephone Number

Residential Address

Telephone Company

City, State, Zip Code

Date of Birth

Last 4 Digits of Social Security Number

Billing Address if Different from Residential Address Listed Above

☐ Check here if Residential Address is a temporary address

Program-Based Eligibility

Put a check mark (✓) in the box next to each of the programs you are currently enrolled in:

- ☐ Medicaid
- ☐ Veteran's Pension & Survivor Benefit
- ☐ Federal Public Housing Assistance (FPHA), Section 8
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Supplemental Security Income (SSI)

Lifeline Application Form

If you are **not** eligible for any of the above programs, you may still be eligible based on your household income level.

Income-Based Eligibility

- ☐ Income-Based Eligibility – Household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Please see the chart below for further details.

Income-Based Eligibility Federal Poverty Guidelines Chart 2017

Family Unit (Household) Size	Lifeline Eligibility Income Limit (yearly)
1	\$16,281
2	\$21,924
3	\$27,567
4	\$33,210
5	\$38,853
6	\$44,496
7	\$50,139
8	\$55,782
For each additional person in the household, add	\$5,643

Definitions (Source - 47 C.F.R 54.400)

Household. A “household” is any individual or group of individuals who live together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians.

Income. “Income” is all income actually received by all members of a household. This includes salary before deductions for taxes, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, lottery winnings, and the like. The only exceptions are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

Lifeline Application Form

Conditions applicable to Lifeline

- (i) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program;
- (ii) Only one Lifeline service is available per household;
- (iii) A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) A household is not permitted to receive Lifeline benefits from multiple providers;
- (v) Violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program; and
- (vi) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- (vii) A Lifeline benefit is not available if a subscriber was enrolled in a qualifying Lifeline-supported broadband Internet access service offering with another Lifeline provider within the previous 12 months or enrolled in a qualifying Lifeline-supported voice telephony service offering with another Lifeline provider within the previous 60 days, with some exceptions.

Initial that you have read these conditions _____

Certification

I certify under penalty of perjury that:

- 1) I meet the program-based or income-based eligibility criteria I have identified on page 1;
- 2) I will notify the Telephone Company within 30 days if, for any reason, I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline support, I am receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit;
- 3) If I move to a new address, I will provide that new address to the Telephone Company within 30 days;
- 4) If I provided a temporary residential address to the Telephone Company, I will be required to verify my temporary residential address every 90 days;
- 5) My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service, other than that to which I am certifying herein;
- 6) The information contained in this certification form is true and correct to the best of my knowledge;
- 7) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law;
- 8) I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility will result in de-enrollment and the termination of my Lifeline benefits pursuant to 47 C.F.R. §

Lifeline Application Form

54.405(e)(4); and 9) if I am receiving tribal Lifeline, I am an eligible resident living on Tribal lands, as defined in 47 C.F.R. 54.400.

Applicant's Signature

Date



DUBOIS TELEPHONE EXCHANGE INC.

307.455.2341 • 800.877.7699 • F 307.455.3399

May 30, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

**Re: WC Docket No. 14-58, 2018 Annual Report, Form 481 for High-Cost Recipients
54.313(f)(1) "Certification of Public Interest Obligations"**

Dear Ms Dortch:

In compliance with the filing requirements associated with, and attached to Form 481, we wish to advise the Commission that Dubois Telephone Exchange, Inc. provides high speed internet service to its customers and:

- Has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream;
- Provides latency suitable for real-time applications including VoIP and usage capacity which is reasonably comparable to those in urban areas and;
- That reasonable requests for service are met within a reasonable timeframe.

If there are questions, I may be contacted at 307-455-2341.

Sincerely,

Michael J. Kenney
Vice President/General Manager

PO BOX 246 • 12 SOUTH FIRST ST • DUBOIS, WY 82513

DUBOISTELEPHONE.COM • YOUR LOCAL ADVANTAGE

USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER NAME

Dubois Telephone Exchange, Inc

(Prepared with Audited Data)

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period.
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING
December, 2016

BORROWER DESIGNATION
WY0515

CERTIFICATION

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII

(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report


Michael Kenney

3/30/2017

DATE

PART A. BALANCE SHEET

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
CURRENT ASSETS			CURRENT LIABILITIES		
1. Cash and Equivalents	4,314,778	5,917,467	25. Accounts Payable	235,571	197,931
2. Cash-RUS Construction Fund	0	1	26. Notes Payable	0	
3. Affiliates:			27. Advance Billings and Payments	122,538	127,183
a. Telecom, Accounts Receivable	11,879	221,024	28. Customer Deposits	3,700	4,500
b. Other Accounts Receivable	2,978	12,467	29. Current Mat. L/T Debt	240,381	553,695
c. Notes Receivable	0	0	30. Current Mat. L/T Debt-Rur. Dev.	0	
4. Non-Affiliates:			31. Current Mat.-Capital Leases	0	
a. Telecom, Accounts Receivable	174,522	202,577	32. Income Taxes Accrued	0	
b. Other Accounts Receivable	831,662	221,968	33. Other Taxes Accrued	29,462	35,918
c. Notes Receivable	0		34. Other Current Liabilities	232,127	280,415
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)	863,779	1,199,642
6. Material-Regulated	139,285	144,534	LONG-TERM DEBT		
7. Material-Nonregulated	4,696	5,629	36. Funded Debt-RUS Notes	648,430	1,232,526
8. Prepayments	156,958	15,496	37. Funded Debt-RTB Notes	0	
9. Other Current Assets			38. Funded Debt-FFB Notes	3,697,518	2,719,015
10. Total Current Assets (1 Thru 9)	5,636,758	6,741,163	39. Funded Debt-Other		
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development	0		42. Reacquired Debt		
b. Nonrural Development	0		43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development	0		45. Other Long-Term Debt		654,500
b. Nonrural Development	0		46. Total Long-Term Debt (36 thru 45)	4,345,948	4,606,041
13. Nonregulated Investments	0		OTHER LIAB. & DEF. CREDITS		
14. Other Noncurrent Assets	0		47. Other Long-Term Liabilities	3,964,020	2,351,224
15. Deferred Charges	98,575	98,574	48. Other Deferred Credits		1,419,480
16. Jurisdictional Differences	0		49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)	98,575	98,574	50. Total Other Liabilities and Deferred Credits (47 thru 49)	3,964,020	3,770,704
PLANT, PROPERTY, AND EQUIPMENT			EQUITY		
18. Telecom, Plant-in-Service	32,074,831	32,078,378	51. Cap. Stock Outstand. & Subscribed	20,613	20,613
19. Property Held for Future Use			52. Additional Paid-in-Capital		
20. Plant Under Construction	76,367	81,279	53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates		
22. Less Accumulated Depreciation	18,868,358	19,611,967	55. Other Capital	(1,019,539)	(1,377,018)
23. Net Plant (18 thru 21 less 22)	13,282,840	12,547,690	56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	10,843,352	11,167,445
			58. Total Equity (51 thru 57)	9,844,426	9,811,040
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		
	19,018,173	19,387,427		19,018,173	19,387,427

Total Equity = 50.61% % of Total Assets

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

WY0515

PERIOD ENDING

December, 2016

INSTRUCTIONS- See RUS Bulletin 1744-2

PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	889,451	887,633
2. Network Access Services Revenues	5,229,428	4,920,614
3. Long Distance Network Services Revenues	187	145
4. Carrier Billing and Collection Revenues	21,432	19,216
5. Miscellaneous Revenues	288,637	345,674
6. Uncollectible Revenues	1,063	1,021
7. Net Operating Revenues (1 thru 5 less 6)	6,428,072	6,172,261
8. Plant Specific Operations Expense	1,596,769	1,610,644
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	208,475	285,629
10. Depreciation Expense	1,602,000	1,736,724
11. Amortization Expense	0	0
12. Customer Operations Expense	216,734	319,312
13. Corporate Operations Expense	939,828	868,392
14. Total Operating Expenses (8 thru 13)	4,563,806	4,820,701
15. Operating Income or Margins (7 less 14)	1,864,266	1,351,560
16. Other Operating Income and Expenses	0	0
17. State and Local Taxes	0	67,179
18. Federal Income Taxes	16,082	(83,802)
19. Other Taxes	564,697	487,798
20. Total Operating Taxes (17+18+19)	580,779	471,175
21. Net Operating Income or Margins (15+16-20)	1,283,487	880,385
22. Interest on Funded Debt	105,470	152,829
23. Interest Expense - Capital Leases	0	0
24. Other Interest Expense	0	0
25. Allowance for Funds Used During Construction	13,368	2,142
26. Total Fixed Charges (22+23+24-25)	92,102	150,687
27. Nonoperating Net Income	(224,740)	72,920
28. Extraordinary Items	0	0
29. Jurisdictional Differences	0	0
30. Nonregulated Net Income	29,632	(28,528)
31. Total Net Income or Margins (21+27+28+29+30-26)	996,277	774,090
32. Total Taxes Based on Income	525,548	403,996
33. Retained Earnings or Margins Beginning-of-Year	10,192,075	10,843,355
34. Miscellaneous Credits Year-to-Date	0	0
35. Dividends Declared (Common)	345,000	450,000
36. Dividends Declared (Preferred)	0	0
37. Other Debits Year-to-Date	0	0
38. Transfers to Patronage Capital	0	0
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	10,843,352	11,167,445
40. Patronage Capital Beginning-of-Year		
41. Transfers to Patronage Capital	0	0
42. Patronage Capital Credits Retired		
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	342,970	460,779
45. Cash Ratio [(14+20-10-11) / 7]	0.5511	0.5760
46. Operating Accrual Ratio [(14+20+26) / 7]	0.8147	0.8818
47. TIER [(31+26) / 26]	11.8171	6.1371
48. DSCR [(31+26+10+11) / 44]	7.8444	5.7761

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		WY0515	
		PERIOD ENDED December, 2016	
INSTRUCTIONS – See help in the online application.			
PART I – STATEMENT OF CASH FLOWS			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)		4,314,778	
CASH FLOWS FROM OPERATING ACTIVITIES			
2. Net Income		774,090	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3. Add: Depreciation		1,736,724	
4. Add: Amortization		0	
5. Other (Explain)			
Changes in Operating Assets and Liabilities			
6. Decrease/(Increase) in Accounts Receivable		363,005	
7. Decrease/(Increase) in Materials and Inventory		(6,182)	
8. Decrease/(Increase) in Prepayments and Deferred Charges		141,463	
9. Decrease/(Increase) in Other Current Assets		0	
10. Increase/(Decrease) in Accounts Payable		(37,640)	
11. Increase/(Decrease) in Advance Billings & Payments		4,645	
12. Increase/(Decrease) in Other Current Liabilities		54,744	
13. Net Cash Provided/(Used) by Operations		3,030,849	
CASH FLOWS FROM FINANCING ACTIVITIES			
14. Decrease/(Increase) in Notes Receivable		0	
15. Increase/(Decrease) in Notes Payable		0	
16. Increase/(Decrease) in Customer Deposits		800	
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)		573,407	
18. Increase/(Decrease) in Other Liabilities & Deferred Credits		(193,316)	
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital		(357,479)	
20. Less: Payment of Dividends		(450,000)	
21. Less: Patronage Capital Credits Retired		0	
22. Other (Explain)			
23. Net Cash Provided/(Used) by Financing Activities		(426,588)	
CASH FLOWS FROM INVESTING ACTIVITIES			
24. Net Capital Expenditures (Property, Plant & Equipment)		(8,459)	
25. Other Long-Term Investments		0	
26. Other Noncurrent Assets & Jurisdictional Differences		0	
27. Other (Explain) prop.plant & equip+afudc+sale os assets-line 24		(993,112)	
28. Net Cash Provided/(Used) by Investing Activities		(1,001,571)	
29. Net Increase/(Decrease) in Cash		1,602,690	
30. Ending Cash		5,917,468	

Revision Date 2010